

*Felony*

**UNITED STATES DISTRICT COURT**

for the  
Southern District of Texas

United States District Court  
Southern District of Texas  
FILED

DEC 15 2014

United States of America )

V. )

Juana LANDEROS-Saenz )

*Defendant(s)* )

David J. Bradley, Clerk of Court

Case No. B-14-MJ-1120

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.  
On or about the date(s) of December 14, 2014 in the county of Cameron in the Southern District of Texas, the defendant(s) violated:

*Code Section*

Title 31, United States Code, Section(s) 5316, 5332

*Offense Description*


knowingly conceal with the intent to evade a currency reporting requirement under Title 31, USC, Section(s) 5316, 5332; did knowingly conceal \$82,077.00 in United States Currency, in any conveyance, namely a vehicle, and transported and attempted to transport that currency from a place within the United States to a place outside the United States, that is, the Republic of Mexico.

This criminal complaint is based on these facts:

On December 14, 2014, Juana LANDEROS-Saenz attempted to depart the United States into Mexico via the Gateway International Bridge in Brownsville. LANDEROS-Saenz was driving a white 1999 Cadillac Escalade bearing Texas license plate [REDACTED]. LANDEROS-Saenz was referred into outbound secondary where CBP officers discovered \$74,410.00 in U.S. currency concealed in a non-factory compartment located in the motor area of the vehicle. LANDEROS-Saenz was also in possession of an additional \$9,667.00 U.S. currency that was discovered on her person. During an interview, LANDEROS-Saenz stated the vehicle was registered in her name and had returned in it on this day from Houston, Texas. LANDEROS-Saenz was to take the vehicle into Mexico where it would be stolen. LANDEROS-Saenz added that she was to be given a vehicle to replace this aforementioned Cadillac Escalade.




Continued on the attached sheet.

  
Complainant's Signature  
Jacob D. Moya Special Agent  
Printed name and title

Sworn to before me and signed in my presence.

Dec 15, 2014  
Date

Brownsville, Texas  
City and State

  
Judge's signature  
Ronald Morgan U.S. Magistrate Judge  
Printed name and title